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CLERK OF THE SEDGWICK COUNTY DISTRICT COURT  
CASE NUMBER: 2022-CV-002052-OT



**Court:** Sedgwick County District Court  
**Case Number:** 2022-CV-002052-OT  
**Case Title:** Office of the Kansas Securities Commissioner, et al. vs. Premier Global Corporation, et al.  
**Type:** Temporary Injunction, etc.

SO ORDERED.

A handwritten signature in cursive script, reading "Deborah K. Hernandez Mitchell".

/s/ Honorable Deborah K Hernandez Mitchell

**IN THE EIGHTEENTH JUDICIAL DISTRICT  
DISTRICT COURT, SEDGWICK COUNTY, KANSAS  
CIVIL DEPARTMENT**

OFFICE OF THE KANSAS )  
SECURITIES COMMISSIONER, *ex rel.* )  
Daniel J. Klucas, Securities Commissioner, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
PREMIER GLOBAL CORPORATION, *et al.*, )  
 )  
Defendants. )  
 )

Case No. 2022-CV-002052-OT

Division 22

\_\_\_\_\_  
Pursuant to K.S.A. 17-12a603

**TEMPORARY INJUNCTION, ORDER FOR NON-DESTRUCTION  
OF RECORDS, AND ORDER FREEZING ASSETS**

This matter comes on for hearing this 15th day of November, 2022, before the Honorable Deborah Hernandez Mitchell, Judge of the District Court, upon Plaintiff’s *Verified Petition for Permanent Injunction and Other Equitable Relief, and Civil Penalties* (“*Verified Petition*”) and *Application for Temporary Restraining Order, Order for Non-Destruction of Records, and Order Freezing Assets* (“*Application for TRO*”), both filed on November 1, 2022.

The Plaintiff appears through counsel Thomas E. Knutzen, Kathlyn W. Daniels, and Bretton W.H. Kreifel.

The Defendants appear not.

The Receiver, Eric L. Johnson, appears through counsel Peter L. Riggs.

As shown by certificates of service filed with the Court, the Defendants were served with the *Verified Petition* and *Application for TRO* as follows, and such service is approved:

- Defendants Premier Global Corporation, Premier Factoring, LLC, PF-2, LLC, PF-3, LLC, PF-4, LLC, PF-5, LLC, PF-6, LLC, PF-7, LLC, and Premier Factoring Group, LLC, were served on November 2, 2022, by personal service upon Jeffrey Frazee, owner and President of Premier Global Corporation and registered agent of Premier Factoring, LLC, PF-2, LLC, PF-3, LLC, PF-4, LLC, PF-5, LLC, PF-6, LLC, PF-7, LLC, and Premier Factoring Group, LLC;
- Defendant Steven J. Parish was served on November 2, 2022, by residential service upon Lori M. Parish;
- Defendant DDI Advisory Group, LLC, was served on November 3, 2022, by personal service upon registered agent Dawn Byers;
- Defendant Richard D. Dean was personally served on November 4, 2022; and
- Defendant KCI Business Services, LLC, was served on November 7, 2022, by personal service upon registered agent David A. Vorbeck.

WHEREUPON the Court, having reviewed the file, heard statements of counsel and the parties, and being otherwise duly informed in the premises, makes the following findings of fact and conclusions of law:

The Court has jurisdiction over the parties and the subject matter of this action.

There is a substantial likelihood that the Plaintiff will succeed on the merits and that the Defendants have violated the Kansas Uniform Securities Act, K.S.A. 17-12a101 *et seq.* ("KUSA"), as alleged in the *Verified Petition*. It appears to this Court that the Plaintiff is entitled to the relief requested in the *Application for TRO*, that there is a reasonable likelihood of future violations by the Defendants unless they are enjoined, that there is a clear threat of immediate and irreparable injury to the public, and that the Defendants may dissipate their assets or make preferential or fraudulent transfer of funds or assets obtained by use of investor proceeds, all to the detriment of the Plaintiff and investors. The relief requested in the *Application for TRO* is not adverse to the public interest.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the Defendants, their agents, servants, employees, assigns, and all those persons, directly or indirectly, acting on their behalf, under their direction or control, and/or in active concert or participation with them, who receive actual notice of this Order, by personal service, mail, facsimile, electronic mail, or otherwise, are, until further order of this Court, temporarily enjoined from offering or selling any security in this state, and from transacting business in this state as an issuer, broker-dealer, agent, investment adviser, and/or investment adviser representative, as those terms are defined in the KUSA.

IT IS FURTHER ORDERED that the Defendants, their agents, servants, employees, assigns, attorneys, and all those persons, directly or indirectly, acting on their behalf, under their direction or control, and/or in active concert or participation with

them, who receive actual notice of this Order by personal service, mail, facsimile, electronic mail, or otherwise, are prohibited from tampering with, mutilating, altering, erasing, concealing, removing, destroying or otherwise disposing of any and all books, records, documents, files, correspondence, computer disks, tapes or other data recordings of any type, pertaining, referring, or related to the Defendants, the *Transferee Agreements* or *Promissory Notes* as described in the *Verified Petition*, or any other financial transactions by the Defendants or to which the Defendants were, are, intended, or intend to become parties.

IT IS FURTHER ORDERED that the assets of the Defendants are hereby frozen. The assets of the Defendants include funds, securities, properties real and personal, tangible and intangible, of whatever kind and description, and wherever situated, held by or under their direct or indirect control, whether held in the name of the Defendants or for the direct or indirect beneficial interest of the Defendants, in whatever form such assets may presently exist (“Assets”).

IT IS FURTHER ORDER that the Defendants, their agents, servants, employees, assigns, attorneys, and all those persons, directly or indirectly, acting on their behalf, under their direction and control, and/or in active concert or participation with them, who receive actual notice of this Order by personal service, mail, facsimile, electronic mail, or otherwise, are, until further order of this Court, temporarily enjoined from withdrawing, transferring, assigning, pledging, selling or otherwise disposing of any Assets of the Defendants held by them, for their benefit, or under their control. All banks, brokerage

firms or other financial institutions, and other persons or entities holding any Assets in the name, for the benefit, or under the control of the Defendants, shall hold and retain such Assets within their control and prohibit the withdrawal, transfer, assignment, pledge, sale, or other disposal of any such Assets.

IT IS FURTHER ORDER that the *Order for Appointment of Receiver*, issued on November 2, 2022, is reaffirmed, and the orders contained therein remain in full force and effect subject to further order of the Court.

THIS ORDER IS ENTERED this 15th day of November, 2022.

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JUDGE OF THE DISTRICT COURT

PREPARED AND APPROVED BY:

/s/ Thomas E. Knutzen  
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